

MEMO ENDORSED

VLADECK, RASKIN & CLARK, P.C.

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December 9, 2022

Hon. Andrew L. Carter, Jr.  
United States District Court Judge  
United States District Court SDNY  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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Re: *United States v. Perry Joyner*, 21 Cr 673 (ALC)

Dear Judge Carter:

I write on behalf of my client, Perry Joyner, who is currently on home incarceration and electronically monitored in New Jersey on an unsecured \$300,000 bond co-signed by three financially responsible individuals, including his mother and his brother's fiancé. He currently lives with his mother and is permitted to attend work and church pursuant to the Court's modification of his bail. The Government has no objection to this request.

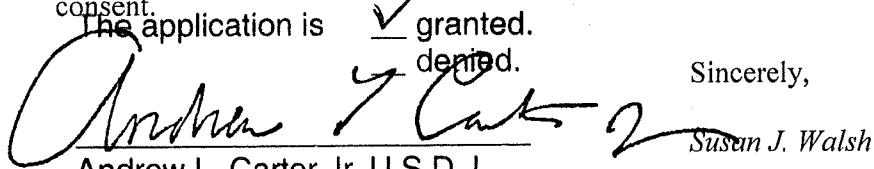
My client who has been observant Christian his entire life and like last year, he would like to attend religious services during the Christmas season. He would like to attend services on Christmas December 25, 2022 with his elderly grandmother who is also a parishioner of the church located at 183 Hegeman Ave, Brooklyn NY 11212 (New Destiny Church Ministries). The services are from 10:30 am until 1 pm so he will require approximately one hour each way from his home by car to attend the full service. He will drive from his home in New Jersey as he does each Sunday.

In addition, my client requests that he be given permission to spend the evening from December 31, 2022 until 12 noon January 1, 2023 at his brother's home in Brooklyn. Only his family will be in attendance, including his brother and his two minor children ages 3 and 8 and two co-signers on my client's bond; his mother and his brother's fiancé. My client's grandmother will also attend. My client will drive to his brother's home located just blocks from the Church at 544 Thatford Ave, Brooklyn New York 11212. He will spend from 8pm on December 31, 2022 through approximately 12 pm on January 1, 2023 at his brother's home, and will not leave his brother's home during that time period except to return to his home in New Jersey.

I write to respectfully request that he be permitted to observe the religious holiday in church and mark the occasions with his immediate family this year with the Government's consent.

The application is  granted.  
 denied.

Sincerely,



Andrew L. Carter Jr., U.S.D.J.

715276 v1 Dated: December 13, 2022

Susan J. Walsh